APPENDIX A COPIES OF CONSULTATION LETTERS

DOE/EA-1392 A-1

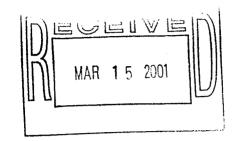
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DOE/EA-1392 A-2



Department of Energy Portsmouth Site Office P.O. Box 700 Piketon, Ohio 45661-0700 Phone: 740-897-5010

March 8, 2001 UE-54-9949



Mr. David Snyder Archeology Reviews Manager Resource Protection and Review 567 East Hudson Street Columbus, Ohio 43211-1030

Dear Mr. Snyder:

NATIONAL HISTORIC PRESERVATION ACT, SECTION 106 COMPLIANCE, INSTALLATION OF OIL FIRED BOILERS IN X-3002 FACILTIY AT THE PORTSMOUTH GASEOUS DIFFUSION PLANT (PORTS) IN PIKETON, OHIO

As required in 36 CFR Part 800, this letter provides official notification to the Ohio Historic Preservation Office of proposed modifications of X-3002 Facility of the Gas Centrifuge Enrichment Plant (GCEP) portion of the Department of Energy's Portsmouth Gaseous Diffusion Plant (PORTS). The X-3002 Facility was originally intended to be a gas centrifuge processing facility; however, no process equipment was installed and the facility has been used as a warehouse. This facility is proposed to be the location developed for installation of oil fired boilers to supply heat for site buildings following cessation of operations of the gaseous diffusion processes at PORTS. In addition, fuel storage tanks would be installed at the site to manage sufficient quantities of fuel oil to fire the boilers.

The following are Section 106 requirements pertaining to the proposed activities:

DOE's designated Agency Official responsible for this planned undertaking:

Ms. Sharon Robinson, Site Manager, Portsmouth Site Office U.S. Department of Energy Post Office Box 700 Piketon, Ohio 45661

Area of Potential Effect (APE):

The area of potential effect would result from internal modifications and minor exterior alterations to X-3002 Facility. Internal modifications would include installation of the boilers inside the building. External modifications would include construction of an opening in the building to allow for venting stacks for fumes generated from combustion of fossil fuels (these vent stacks would result in minor visible alteration of the facility but would not adversely affect the building's appearance). The X-3002 Facility was originally intended to be a gas centrifuge processing facility; however, no process equipment was installed. Since completion of construction, the X-3002 Facility has been used only as a warehouse.

Identification of Consulting Parties:

The consulting party recommended by DOE for this project is the Ohio State Historic Preservation Office (SHPO). The APE is within the previously disturbed area of the operating PORTS plant. In addition, the APE is within areas disturbed during construction of the GCEP facility and therefore should not result in any additional impact to Native American Indian tribal, religious, or cultural sites.

Public Participation:

The proposed undertaking will be addressed during the DOE public meeting in the spring of 2001, prior to initiation of building modifications. At this meeting DOE will solicit and respond to public concerns related to this proposal.

Assignment of Section 106 Review Responsibilities:

DOE is the sole agency responsible for the Section 106 review process for this project.

Incorporation of Section 106 in Environmental Documents:

A National Environmental Policy Act review of this action is being prepared. When completed this CX will address any Section 106 requirements.

DOE PORTS has determined that the proposed project would not have adverse effects on historical resources included or eligible for inclusion in the National Register of Historic Places (National Register). The proposed alterations to X-3002 Facility are minor and would result in only slight alteration of the external appearance of the building (vent stacks may be noticeable from some locations). Internal alterations to the structure would involve installation of oil fired boilers and appurtenances necessary to operate the boilers and heating system. This will result in minimal impact to the building's interior since no equipment was placed in the facility and no operational activities occurred. In addition, the proposed alterations to X-3002 Facility would not impact on the historical integrity of the PORTS core plant since all of the GCEP Facilities were constructed from the late1970s through early 1980s in a location separate from the Gaseous Diffusion Plant. Furthermore, the X-3002 Facility was not completed, gas centrifuge equipment was not installed, and gas centrifuge operations were not functional at this facility.

DOE PORTS requests your concurrence with DOE's determination of no adverse effects on cultural resources. Please provide written conformation of the Ohio SHPO's determination.

If you have any questions or require additional information related to this proposed process please call Ray Moore at (865) 576-9574 or Kristi Wiehle at (740) 897-5020.

Sincerely,

Sharon J. Robinson

Site Manager

Portsmouth Site Office

cc:

Tom McCulloch Advisory Council on Historic Preservation 1100 Pennsylvania Avenue Northwest 803 Washington, DC 20004

Lois Thompson, EH-232/FORS Skip Gosling, HR-76/FORS Bob Poe, SE-30/ORO Harold Monroe, SE-30/ORO David Allen, SE-32/ORO Ray T. Moore, SE-32/ORO J. King, BJC/PORTS

Koserrany Richmond

Ohio Historic Preservation Office

567 East Hudson Street Columbus, Ohio 43211-1030 614/ 298-2000 Fax: 614/ 298-2037

Visit us at www.ohiohistory.org/resource/histpres/

April 23, 2001

OHIO HISTORICAL SOCIETY

Sharon Robinson
Site Manager
Portsmouth Site Office
U.S. Department of Energy
P.O. Box 700
Piketon, Ohio 45661

Dear Ms. Robinson:

Re: Installation of Oil-Fired Boilers, Facility X-3002, Portsmouth Gaseous Diffusion Plant, Piketon, Ohio

This is in response to your correspondence, received on March 16, 2001, regarding the project referenced above. The Portsmouth Gaseous Diffusion Plant was previously determined to be eligible for the National Register of Historic Places. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Facility X-3002 was one of several facilities constructed in the 1970s and 1980s as part of the Gas Centrifuge Enrichment Plant. Although Facility X-3002 was intended to be a gas centrifuge processing facility, no process equipment was installed and the building functions as a warehouse. Based on the information submitted, it is my opinion that the proposed work, if completed as described, will have no adverse effect on historic properties listed in or eligible for the National Register of Historic Places.

If you have any questions concerning this review, please contact David Snyder or Sandra Davies at the address listed above. Thank you for your cooperation.

Sincerely,

Mark J. Epstein, Department Head Resource Protection and Review

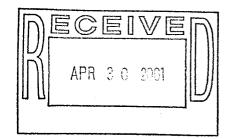


Department of Energy Portsmouth Site Office P.O. Box 700 Piketon, Ohio 45661-0700

Phone: 740-897-5010

April 25, 2001 EM-97-0014

Mr. David Snyder Archeology Reviews Manager Resource Protection and Review 567 East Hudson Street Columbus, Ohio 43211-1030



Dear Mr. Snyder:

NATIONAL HISTORIC PRESERVATION ACT, SECTION 106 COMPLIANCE, INSTALLATION OF A NATURAL GAS PIPELINE FROM ZAHNS CORNER TO THE X-3002 BUILDING AT THE PORTSMOUTH GASEOUS DIFFUSION PLANT (PORTS) IN PIKETON, OHIO

As required in 36 CFR Part 800, this letter provides official notification to the Ohio Historic Preservation Office of the proposed installation of a natural gas pipeline from Zahns Corner to the X-3002 Building of the Gas Centrifuge Enrichment Plant (GCEP) portion of the Department of Energy's Portsmouth Gaseous Diffusion Plant (PORTS) in Piketon, Ohio. The X-3002 Facility was originally intended to be a gas centrifuge processing facility; however, no process equipment was installed and the facility has been used as a warehouse. The purpose of the natural gas pipeline is to supply fuel for the recirculating hot water plant to be installed at the X-3002 Building. The boilers for the recirculating hot water plant will be operated with No.2 fuel oil until the natural gas pipeline installation is complete. The route of the pipeline will follow existing right-of-ways to the extent possible.

The following are Section 106 requirements pertaining to the proposed activities:

DOE's designated Agency Official responsible for this planned undertaking:

Ms. Sharon Robinson, Site Manager, Portsmouth Site Office U.S. Department of Energy Post Office Box 700 Piketon, Ohio 45661

Area of Potential Effect:

The area of potential effect (APE) is presented in Figure 1. This proposed route roughly approximates the location of the natural gas pipeline. Currently there is no natural gas supply line for the PORTS site. Internal and external modifications to the X-3002 Building were discussed in a prior notification letter in March 2001.

Identification of Consulting Parties:

The consulting parties recommended by DOE for this project are the Ohio State Historic Preservation Office (SHPO) and the Pike County Chamber of Commerce. The APE is in an area adjacent to the PORTS reservation. The pipeline route will follow existing right-of-ways to the extent practicable; easements through private property, US Route 32 and other roadways will be required for sections of the pipeline external to the PORTS reservation. The APE should not result in any additional impact to Native American Indian tribal, religious, or cultural sites because most of the areas in the path of the proposed pipeline have been previously disturbed by residential or commercial development and any artifacts encountered can be easily avoided by alteration of the proposed path of the pipeline. However, if any Native American Indian tribal, religious, or cultural sites are encountered, work will be halted and an investigation of all findings will be conducted. A preliminary walkover by DOE of the proposed right-of-way will be conducted once final easements are negotiated and a final location for the pipeline is determined.

Public Participation:

The proposed undertaking will be addressed during the DOE public meeting on May 15, 2001, prior to obtaining easements for the pipeline route. At this meeting DOE will solicit and respond to public concerns related to this proposal.

Assignment of Section 106 Review Responsibilities:

DOE is the sole agency responsible for the Section 106 review process for this project.

Incorporation of Section 106 in Environmental Documents:

A National Environmental Policy Act review of this action is being prepared. When completed this document will address any Section 106 requirements.

DOE PORTS does not believe that the proposed project would have adverse effects on historical resources included or eligible for inclusion in the National Register of Historic Places (National Register) because most of the areas in the path of the proposed pipeline have been previously disturbed by residential or commercial development and any historically significant site encountered can be easily avoided by alteration of the proposed path of the pipeline. The proposed alterations to X-3002 Facility were addressed in a prior notification letter in March 2001.

DOE PORTS requests your concurrence with DOE's determination that no adverse effects on cultural resources will result from this action. Please provide written confirmation of the Ohio SHPO's determination.

If you have any questions or require additional information related to this proposed process please call Ray Moore at (865) 576-9574 or Melda Rafferty at (740) 897-5521.

Sincerely,

Sharon J. Robinson

Site Manager

Portsmouth Site Office

Enclosure

cc w/enclosure: Tom McCulloch Advisory Council on Historic Preservation 1100 Pennsylvania Avenue Northwest 803 Washington D C 20004

Lois Thompson, EH-232, FORS Skip Gosling, HR-76, FORS Bob Poe, SE-30/ORO Harold Monroe, SE-30/ORO David Allen, SE-32/ORO Ray T. Moore SE-32/ORO Administrative Records Jim King, BJC/PORTS

Rosenny Richmond



Department of Energy

Oak Ridge Operations Office P.O. Box 2001 Oak Ridge, Tennessee 37831—

May 3, 2001

Ms. Patricia Jones Ohio Department of Natural Resources Heritage Program 1889 Fountain Square, Bldg. F-1 Columbus, Ohio 43224

Dear Ms. Jones:

LETTER OF CONSULTATION FOR THE PROPOSED TRANSFER OF LAND AND FACILITIES AT THE PORTSMOUTH GASEOUS DIFFUSION PLANT

The U.S. Department of Energy (DOE) is preparing an Environmental Assessment (EA) for the Portsmouth Gaseous Diffusion Plant (PORTS) located at Piketon, Ohio, in accordance with the National Environmental Policy Act (NEPA). The proposed action is to conduct winterization activities in preparation for cold standby for facilities at PORTS.

Winterization of PORTS is necessary because of DOE's decision to place the plant in cold standby, and facilities and systems must be protected from freezing. Freezing of facilities and systems would likely have the following results:

- substantial damage from freezing of fire protection systems;
- potential RCRA waste storage permit violations due to lack of heat, and
- generation of large amounts of contaminated water or other materials requiring cleanup, processing, storage and/or disposal.

Other impacts include lack of heating for facilities housing DOE and contractor staff and possible concerns with facilities containing highly enriched uranium.

Proposed winterization activities include installation and operation of a hot water heating facility with associated recirculating water pumps in an existing vacant structure and installation and operation of a series of electric heaters in PORTS process buildings. The hot water boilers would initially operate on oil, but would likely be converted to natural gas in the future. Since use of natural gas would require running an approximate five-mile natural gas line to the site (see enclosure), the impact of the new gas line would also be addressed in the EA. Alternatives to the proposed action which would be considered include the "No Action Alternative" required by NEPA.

This letter is intended to serve as informal consultation regarding protected or rare species that may be on or near the site. In this regard, DOE requests an updated list of protected species and habitats on the DOE/PORTS property and solicits your recommendations and comments about the potential effects of this proposed action. Your input will be used in the preparation of the EA. Because of the urgent need to initiate winterization activities as soon as possible, we would appreciate a reply to this letter by May 11, 2001.

If you need further information on this request, please do not hesitate to call me at (865) 576-0938.

Sincerely,

James L. Elmore, Ph.D.

Alternate NEPA Compliance Officer

Enclosure

cc:

D. Allen, SE-30-1

G. Hartman, EM-912



Department of Energy

Oak Ridge Operations Office P.O. Box 2001 Oak Ridge, Tennessee 37831—

May 3, 2001

Mr. Kent Kroonemeyer Field Supervisor U.S. Fish and Wildlife Servic 6950-H Americana Parkway Reynoldsburg, Ohio 43068-4127

Dear Mr. Kroonemeyer:

INFORMAL CONSULTATION UNDER SECTION 7 OF THE ENDANGERED SPECIES ACT FOR THE PROPOSED TRANSFER OF LAND AND FACILITIES AT THE PORTSMOUTH GASEOUS DIFFUSION PLANT

The U.S. Department of Energy (DOE) is preparing an Environmental Assessment (EA) for the Portsmouth Gaseous Diffusion Plant (PORTS) located at Piketon, Ohio, in accordance with the National Environmental Policy Act (NEPA). The proposed action is to conduct winterization activities in preparation for cold standby for facilities at PORTS.

Winterization of PORTS is necessary because of DOE's decision to place the plant in cold standby, and facilities and systems must be protected from freezing. Freezing of facilities and systems would likely have the following results:

- substantial damage from freezing of fire protection systems;
- potential RCRA waste storage permit violations due to lack of heat, and
- generation of large amounts of contaminated water or other materials requiring cleanup, processing, storage and/or disposal.

Other impacts include lack of heating for facilities housing DOE and contractor staff and possible concerns with facilities containing highly enriched uranium.

Proposed winterization activities include installation and operation of a hot water heating facility with associated recirculating water pumps in an existing vacant structure and installation and operation of a series of electric heaters in PORTS process buildings. The hot water boilers would initially operate on oil, but would likely be converted to natural gas in the future. Since use of natural gas would require running an approximate five-mile natural gas line to the site (see enclosure), the impact of the new gas line would also be addressed in the EA. Alternatives to the proposed action which would be considered include the "No Action Alternative" required by NEPA.

This letter is intended to serve as informal consultation under Section 7 of the Endangered Species Act. In this regard, DOE requests an updated list of protected species and habitats on the DOE/PORTS property and solicits your recommendations and comments about the potential effects of this proposed action. Your input will be used in the preparation of the EA. Because of the urgent need to initiate winterization activities as soon as possible, we would appreciate a reply to this letter by May 11, 2001.

If you need further information on this request, please do not hesitate to call me at (865) 576-0938.

Sincerely,

James L. Elmore, Ph.D.

Alternate NEPA Compliance Officer

Enclosure

cc:

D. Allen, SE-30-1

G. Hartman, EM-912



Ohio Department of Natural Resources

BOB TAFT, GOVERNOR

SAMUEL W. SPECK, DIRECTOR

Division of Natural Areas & Preserves
Stuart Lewis, Chief
1889 Fountain Square, Bldg. F-1
Columbus, OH 43224-1388
Phone: (614) 265-6453; Fax: (614) 267-3096

May 7, 2001

James L. Elmore
Department of Energy
Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, TN 37831

Dear Dr. Elmore:

The Ohio Natural Heritage Database contains no records for rare species or unique natural features on the Portsmouth Gaseous Diffusion Plant property located near Piketon, Pike County on the Piketon, Waverly South, Wakefield and Lucasville quads. The records listed below are for rare plant species and a significant plant community at sites east of the proposed natural gas line. The numbers on the list correspond to the numbered locations on the accompanying map. The potentially threatened status is not a legal designation. Because of the distance of these records from the pipeline route we do not anticipate adverse impacts to these species and community.

Waverly South Quad:

- 1. Scutellaria integrifolia Hyssop Skullcap, potentially threatened, 1981
- 2. Gratiola viscidula Short's Hedge-hyssop, potentially threatened, 1981 Rhexia virginica Virginia Meadow-beauty, potentially threatened, 1981
- 3. Gratiola viscidula Short's Hedge-hyssop, potentially threatened, 1981
- 4. Mixed Emergent Marsh plant community 1981 survey, Given's Marsh, a well defined 4 acre cattail marsh in the main Teays River valley. Wool-grass and rice cutgrass are secondary dominants. Considered a good local example of this community type.

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James I.. Elmore May 7, 2001 Page 2

Our primary concern would be potential impacts to Big Beaver Creek as a result of the pipeline crossing. This needs to be addressed in your environmental assessment for this project. You may wish to contact Mr. Edward Rankin at the Ohio EPA to determine if there are any fish data available for this stream. His phone number is (614) 836-8772.

Please contact me if I can be of any further assistance.

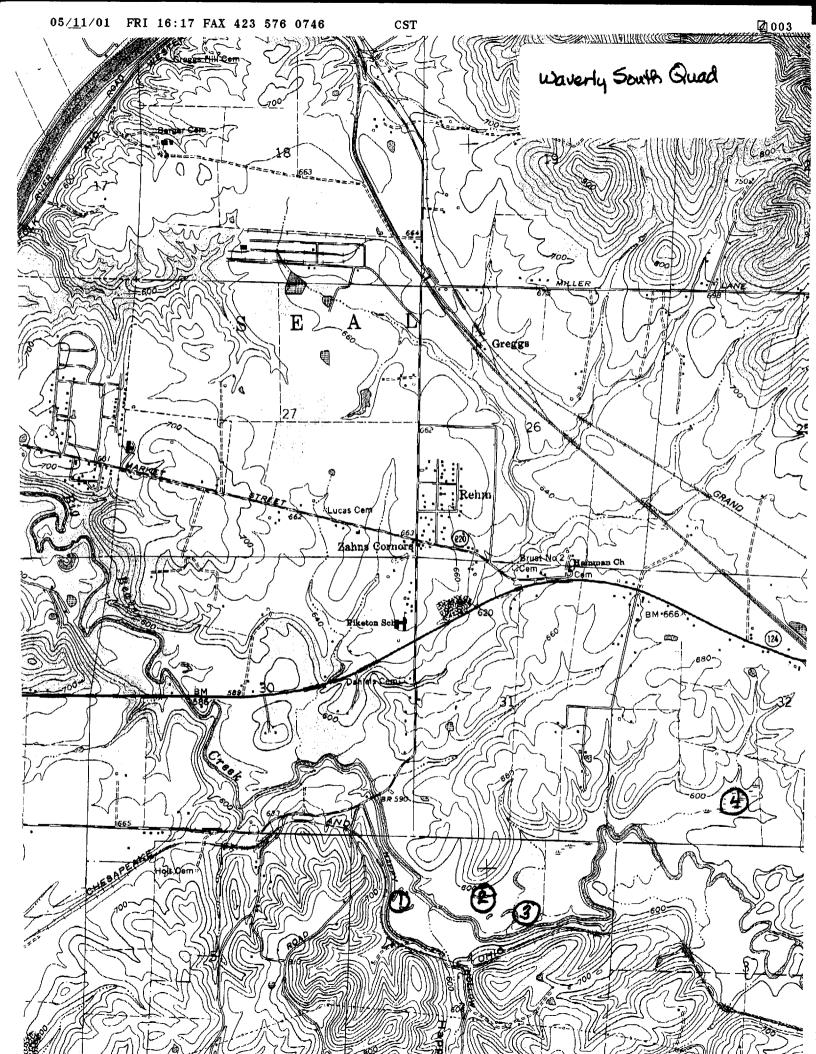
Sincerely,

Patricia D. Jones

Data Services Administrator

Support Services Group

Enclosure





United States Department of the Interior

FISH AND WILDLIFE SERVICE



Ecological Services 6950 Americana Parkway, Suite H Reynoldspurg Objo 43068-4127 Fax: (614) 469-6919

June 11, 2001

Mr. James L. Elmore Department of Energy Oak Ridge Operation Office P.O. Box 2001 Oak Ridge, TN 37831

Dear Mr. Elmore:

This is in response to your May 3, 2001 letter requesting information we may have regarding the occurrence or possible occurrence of Federally-listed threatened or endangered species within the vicinity of the proposed site. The project involves the winterization of the Portsmouth Gaseous Diffusion Plant, located at Piketon, Pike County, Ohio. Proposed winterization activities include Diffusion and operation of a hot water heating facility with associated recirculating water pumps in an existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the process existing vacant structure and installation and operation of a series of electric heaters in the pr

ENDANGERED SPECIES COMMENTS: The proposed project lies within the range of the Indiana bat, a Federally listed endangered species. Summer habitat requirements for the species are not well defined but the following are thought to be of importance:

- 1. Dead trees and snags (especially those with exfoliating bark) which may be used as maternity roost areas along riparian corridors.
- 2. Live trees (such as shagbark hickory) which have exfoliating bark.
- 3. Stream corridors, riparian areas, and nearby woodlots which provide forage sites.

Considering the above items, we recommend that if trees with exfoliating bark (which could be potential roost trees) are encountered on the proposed site, they should be saved wherever possible. If they must be cut, they should not be cut between April 15 and September 15.

If desirable trees are present and if the above time restriction is unacceptable, mist net or other surveys should be conducted to determine if bats are present. The survey should be designed and conducted in coordination with the endangered species coordinator for this office. The survey should be conducted in June or July since the bats would only be expected in the project area from approximately April 15 to September 15.

The project lies within the range of the timber rattlesnake, a large shy rattlesnake that is declining throughout its national range. No Federal listing status has been assigned to this species. Instead, the U.S. Fish and Wildlife Service has initiated a pre-listing Conservation Action Plan to support state and local conservation efforts. Your proactive efforts to conserve this species now may help avoid the need to list the species under the Endangered Species Act in the future. The timber rattlesnake is protected throughout much of its range and listed as endangered by the State of Ohio. Due to their rarriy and reclusive nature, we encourage early project coordination to avoid potential impacts to timber rattlesnakes and their habitat.

In Ohio, the timber rattlesnake is restricted to the un-glaciated Allegheny Plateau and utilizes the specific habitat types, depending upon season. Winters are spent in dens usually associated with high, dry ridges. These dens may face any direction, but southeast to southwest are most common. Such dens usually consist of narrow crevices in the bedrock. Rocks may or may not be present on the surface. From these dens, timber rattlesnakes radiate throughout the surrounding hills and move distances as great as 4.5 miles. In the fall, timber rattlesnakes return to the same den. Intensive efforts to transplant timber rattlesnakes have not been successful. Thus protection of the winter dens is critical to the survival of this species. Some project management ideas include the following:

1) At a minimum, project evaluations should contain delineations of timber ranlesnake habitat within project boundaries. Descriptions should indicate the quality and quantity of timber

rattlesnake habitat (den sites, basking sites, and foraging area, etc.) that may be affected by the project.

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- 2) In cases where timber rattlesnakes are known to occur or where potential habitat is rated 2) In cases where timber rattlesnakes are known to occur or where potential habitat is rated moderate to high, timber rattlesnake surveys may be necessary. If surveys are to be conducted, it may be helpful to inquire about timber rattlesnake sightings with local resource agency personnel or reliable local residents. In addition, local herpetologists may have knowledge of historical populations as well as precise knowledge of the habits, and especially the specific, local types of habitats that may contain timber rattlesnakes. Surveys should be performed during the periods of spring emergence from dens (usually a narrow window in April or May) and throughout the active season until October. The species is often easiest to locate during the summer months when pregnant females seek open areas in early morning, especially after cool evenings.
- 3) In portions of projects where timber rattlesnakes will be affected, clearing and construction activities should occur at distances greater than 100 feet from known dens. Most importantly, tops of ridges and areas of exposed rock should be avoided.
- 4) In areas where timber rattlesnake dens are known or likely to exist, maintenance activities (mowing, cutting, burning, etc.) should be conducted from November 1 to March 1, when timber rattlesnakes are hibernating.

This technical assistance letter is submitted in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended: 16 U.S.C.661 et seq.), the Endangered Species Act of 1973, as amended, and is consistent with the intent of the National Environmental Policy Act of 1969, and the U.S. Fish and Wildlife Service's Mitigation Policy.

If you have questions, or if we may be of further assistance in this matter, please contact Megan Sullivan at extension 16 in this office.

Sincerely,

Kenneth C. Lammers Acting Supervisor

Hawwen

cc: DOW, Wildlife Environmental Section, Columbus, OH